

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION	Master File No. 2:12-MD-02327 MDL 2327
THIS DOCUMENT RELATES TO: Ethicon Wave 4 cases listed in Exhibit A	JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

**PLAINTIFFS' MOTION TO EXCLUDE CERTAIN OPINIONS
AND TESTIMONY OF HARRY JOHNSON, M.D.**

Plaintiffs respectfully request that the Court preclude defense expert Harry Johnson, M.D., from giving opinions on (1) the safety and efficacy of Defendants' products based on his own clinical practice; (2) the design of Defendants' transvaginal mesh products at issue, including the safety and efficacy of those devices; and (3) the adequacy of Defendants' product warnings and instructions for use. The basis for Plaintiffs' motion is more fully set out in the accompanying Memorandum.

Dated: April 13, 2017

Respectfully submitted,

/s/ Thomas P. Cartmell

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CERTIFICATE OF SERVICE

I hereby certify that I filed the foregoing document on April 13, 2017, using the Court's CM-ECF filing system, thereby sending notice of the filing to all counsel of record in this matter.

/s/Thomas P. Cartmell
Attorney for Plaintiffs

INDEX OF EXHIBITS

Exhibit A: List of cases on which Dr. Johnson is designated

Exhibit B: Johnson Expert Report

Exhibit C: Johnson Deposition March 21, 2016